

### **REMARKS**

This Application has been reviewed in light of the Office Action dated May 11, 2009. Claims 22 – 40 are pending in this Application. Claims 28-29 and 38-39 are cancelled herewith. Claims 22, 23, and 33 are currently amended. Applicants respectfully submit no new matter is added by the present amendments. Support for the present amendments can be found throughout the specification, for example on page 6, lines 18-26 and page 8, lines 2-6.

### **Rejections Under 35 U.S.C. § 112**

Claims 22, 23, 28, 29, 33, 38 and 39 are objected to under 35 U.S.C. § 112 for minor informalities. The Examiner objected to Applicants' use of the phrase "adapted to." Applicants amended claims 22, 23, and 33 herewith to correct this informality. The Examiner objected to claims 28-29 and 38-39 for not further limiting independent claims 22 and 33, respectively. Applicants cancelled claims 28-29 and 38-39 herewith. Thus, Applicants respectfully submit that the amended claims are in condition for allowance and this rejection is overcome. Reconsideration is respectfully requested.

### **Rejections Under 35 U.S.C. § 103**

Claims 22, 23, 28 and 29 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Publication No. 2004/0167823 to Neely et al. (hereinafter "Neely") in view of U.S. Patent No. 7370014 to Vasavada et al. (hereinafter "Vasavada") and U.S. Patent Publication No. 2004/0117776 to Pazandek (hereinafter "Pazandek"). Applicants respectfully traverse this three reference rejection.

The Examiner acknowledges that Neely does not disclose or suggest all the limitations of claim 22, including the "limitations of the expense information being received from a plurality of expense data providers or a specific parsing module and an extension to the specific parsing module." (Office Action, page 4). Further, the Examiner acknowledges that the combination of Neely and Vasavada does not disclose or suggest all the limitations of claim 22, including the "limitations of at least one specific parsing module corresponding to at least one of said plurality of formats, the specific parsing module(s) being adapted to overwrite functions of the generic file

parser which are not suited for a format of said plurality of formats corresponding to the respective specific parsing module, the at least one extension being adapted to process specific fields of said expense information.” (Office Action, page 5). However, the Examiner suggests the combination of Neely, Vasavada, and Pazandek disclose each and every element of independent claim 22.

Without acquiescing to or acknowledging the Examiner’s assertions as correct, Applicants have amended claim 22 herewith to more clearly define the invention. Applicants respectfully submit Neely, Vasavada, or Pazandek alone or in combination do not disclose or suggest Applicants’ claimed invention as recited in amended claim 22.

Amended claim 22 recites:

22. A computer system including at least one processor and memory, for processing expense information, the system comprising: **a generic file parser configured to receive said expense information from a plurality of expense data providers, wherein said expense information includes data in a plurality of formats, said expense information including invoice information and transaction information, said generic file parser configured to output data in a common format; at least one specific parsing module corresponding to at least one of said plurality of formats, the specific parsing module(s) being configured to overwrite functions of the generic file parser which are not suited for a format of said plurality of formats corresponding to the respective specific parsing modules; said specific parsing module including at least one extension of said generic file parser, the at least one extension being configured to process specific fields of said expense information; an invoice processing module configured to receive said expense information and process said invoice information for invoicing; and a balance processing module configured to receive said expense information and process said transaction information for specific accounts. (*emphasis added*).**

The Examiner acknowledges that Neely does not disclose or suggest the expense information being received from a plurality of expense data providers or a specific parsing module and an extension to the specific parsing module, as claimed by Applicants. The Examiner asserted that Neely discloses “a generic file parser adapted to receive said expense information.” (Office Action, page 4). Contrary to the Examiner’s assertion, Applicants

respectfully submit Neely does not disclose or suggest “a generic file parser configured to receive said expense information from a plurality of expense data providers,...said generic file parser configured to output data in a common format,” as recited in amended claim 22. Rather, Neely only discloses a means for receiving data in “at least one of the group consisting of an .xml file, an .edi file, a text delimited, and a web e-form.” (See Neely, paragraph [0016]). Specifically, among other things, there is no disclosure or suggestion in Neely regarding a “generic file parser configured to output data in a common format.” Thus, Neely does not disclose or suggest “a generic file parser configured to receive said expense information from a plurality of expense data providers, wherein said expense information includes data in a plurality of formats, said expense information including invoice information and transaction information, said generic file parser configured to output data in a common format,” as recited in amended claim 22.

The Examiner acknowledges that the combination of Neely and Vasavada does not disclose or suggest a specific parsing module and an extension to the specific parsing module, as claimed by Applicants. The Examiner asserted that Vasavada discloses “a parser adapted to receive said expense information from a plurality of expense data providers.” (Office Action, page 4). Contrary to the Examiner’s assertion, Applicants respectfully submit Vasavada does not disclose or suggest “a generic file parser configured to receive said expense information from a plurality of expense data providers...said generic file parser configured to output data in a common format,” as recited in amended claim 22. Rather, Vasavada discloses “[a]n electronic bill presentation and payment (EBPP) system that is able to obtain bills for its customers from scrape-enabled biller Web sites.” (See Vasavada, abstract). Vasavada simply uses a “[b]ill bot” to extract data from biller Web sites. (See Vasavada, column 13, lines 5-8). Vasavada does not disclose or suggest “a generic file parser configured to receive said expense information from a plurality of expense data providers.” Vasavada does not disclose or suggest a “generic file parser configured to output data in a common format.” Thus, Vasavada does not cure the deficiencies of Neely in arriving at Applicants’ claimed invention, as it does not alone or in combination with Neely disclose or suggest “a generic file parser configured to receive said expense information

from a plurality of expense data providers,...said generic file parser configured to output data in a common format,” as recited in amended claim 22.

The Examiner asserted that Pazandek discloses “a generic file parser.” (Office Action, page 5). Contrary to the Examiner’s assertion, Applicants respectfully submit Pazandek does not disclose or suggest “a generic file parser configured to receive said expense information from a plurality of expense data providers, wherein said expense information includes data in a plurality of formats,...said generic file parser configured to output data in a common format,” as recited in amended claim 22. Rather, Pazandek only discloses “parsing an XML document” including using “type-specific object classes” in contrast to object classes defined by generic “Elements.” (See Pazandek, paragraphs [0011] and [0020]). Pazandek discloses the past use of object classes defined by generic “Elements,” wherein the generic Elements correspond to “generic information about the structure of the XML document, such as page, header, and paragraph outline arrangement.” (See Pazandek, paragraph [0020]). Pazandek does not disclose or suggest “a generic file parser configured to receive said expense information from a plurality of expense data providers.” Pazandek does not disclose or suggest “a generic file parser configured to receive...data in a plurality of formats.” Pazandek does not disclose or suggest any “generic file parser configured to output data in a common format.” Thus, Pazandek does not cure the deficiencies of Neely and/or Vasavada in arriving at Applicants’ claimed invention, as it does not alone or in combination with Neely or Vasavada disclose or suggest “a generic file parser configured to receive said expense information from a plurality of expense data providers,...said generic file parser configured to output data in a common format,” as recited in amended claim 22.

Further, the Examiner asserted that Pazandek discloses “a generic file parser, including the further limitations of at least one specific parsing module corresponding to at least one of said plurality of formats, the specific parsing module(s) being adapted to overwrite functions of the generic file parser which are not suited for a format of said plurality of formats corresponding to the respective specific parsing module, and at least one extension of a specific parsing module, the at least one extension being adapted to process specific fields of said expense information.” (Office Action, page 5). Contrary to the Examiner’s assertion, Applicants respectfully submit

Pazandek does not disclose or suggest “at least one specific parsing module corresponding to at least one of said plurality of formats, the specific parsing module(s) being configured to overwrite functions of the generic file parser which are not suited for a format of said plurality of formats corresponding to the respective specific parsing modules; said specific parsing module including at least one extension of said generic file parser, the at least one extension being configured to process specific fields of said expense information,” as recited in amended claim 22. Rather, Pazandek discloses parsing an XML document including using “type-specific object classes” which are capable of parsing the “particular information contained in the XML document,” such as specific elements within the XML document. (See Pazandek, paragraph [0023]). Applicants respectfully submit that specific parsing to instantiate Elements in an object oriented programming environment to produce application specific objects generally, as described in Pazandek, does not disclose or suggest anything about the specifically claimed processing of expense information in which a “specific parsing module” is configured to “overwrite functions of the generic file parser” in the field of expense information processing. Further, parsing of XML documents using “type-specific object classes,” as described in Pazandek, does not disclose or suggest a “specific parsing module corresponding to at least one of said plurality of formats,” as recited in Applicants’ claim 22. Additionally, Pazandek does not disclose or suggest any “specific parsing module...configured to overwrite functions of the generic file parser.”

Applicants respectfully submit, it would require improper hindsight construction, in view of Applicants’ specification, to modify the disclosure of specific parsing and apply it to the field of expense information processing, as the Examiner asserted. Furthermore, Pazandek teaches away from receiving expense information in a plurality of formats. Pazandek teaches obtaining XML data from an XML source using “type-specific object classes.” Thus, one skilled in the art would not make such a combination including Pazandek, which the Examiner has done in hindsight in an attempt to reconstruct Applicants’ invention using Applicants’ disclosure. Pazandek does not cure the deficiencies of Neely and/or Vasavada in arriving at Applicants’ claimed invention. Pazandek does not alone or in combination with Neely or Vasavada disclose or suggest each and every element as recited in Applicants’ amended claim 22.

Applicants respectfully submit Neely, Vasavada, or Pazandek alone or in combination do not render independent claim 22, and by extension all other claims which are dependent thereupon, obvious to one skilled in the art. Therefore, Applicants respectfully submit that this rejection is improper and should be withdrawn. Reconsideration is respectfully requested.

Claims 24-27, 30 and 31 are rejected under 35 U.S.C. §103(a) as being unpatentable over Neely and Vasavada in view of Pazandek as applied to claim 22 and further in view of U.S. Patent Publication No. 2002/0147622 to Drolet et al. (hereinafter “Drolet”). Applicants respectfully traverse this four reference rejection.

The Examiner acknowledges that Neely, Vasavada, and Pazandek do not disclose or suggest “the further limitations of the loader component to sort said parsed data into a plurality of temporary tables as a function of said plurality of fields; and a data sorting component, in communication with said plurality of temporary tables and with said database, to access sorted data in said plurality of temporary tables, and to re-sort said sorted data into a plurality of tables in said database.” (Office Action, page 7).

The Examiner asserted that Drolet discloses “the loader component..., and a data sorting component...” (Office Action, page 7-8). Contrary to the Examiner’s assertion, Applicants respectfully submit Drolet discloses “a system and method for using an electronic hub to facilitate supply chain management through the creation of business rules that monitor critical supply chain parameters and the subsequent generation of alert notifications to inform suppliers and buyers of violations to the business rules.” (See Drolet, abstract).

Applicants respectfully submit Drolet does not cure the deficiencies of Neely, Vasavada, and/or Pazandek in arriving at Applicants’ claimed invention, as it does not alone or in combination with Neely, Vasavada, or Pazandek disclose or suggest each and every element as recited in Applicants’ amended claim 22. Specifically, Drolet does not disclose or suggest “a generic file parser.” Drolet does not disclose or suggest “a generic file parser configured to receive...data in a plurality of formats.” Drolet does not disclose or suggest a “generic file parser configured to output data in a common format.” Drolet does not disclose or suggest “at least one specific parsing module corresponding to at least one of said plurality of formats.” Drolet does not disclose or suggest a “specific parsing module(s) being configured to overwrite functions of

the generic file parser.” Drolet does not disclose or suggest a “specific parsing module including at least one extension of said generic file parser.”

Thus, Applicants respectfully submit Neely, Vasavada, Pazandek, or Drolet alone or in combination do not render independent claim 22, and by extension all other claims which are dependent thereupon, obvious to one skilled in the art. Therefore, Applicants respectfully submit that this four reference rejection is improper and should be withdrawn. Reconsideration is respectfully requested.

Claim 32 is rejected under 35 U.S.C. §103(a) as being unpatentable over Neely and Vasavada, in view of Pazandek, in view of Drolet as applied to claim 31, and further in view of U.S. Patent No. 6633878 to Underwood (hereinafter “Underwood”). Applicants respectfully traverse this five reference rejection.

The Examiner acknowledges that Neely, Vasavada, Pazandek, and Drolet does not disclose or suggest “the further limitation of said data sorting component includes additional information in said data tables regarding tax information for said transactional data.” (Office Action, page 9). However, the Examiner asserted that Underwood discloses “the further limitation wherein said data sorting component includes additional information in said data tables regarding tax information for said transactional data.” (Office Action, page 9). Contrary to the Examiner’s assertion, Applicants respectfully submit Underwood discloses “[a] system, method and article of manufacture...for initializing a database used with an issue tracker,” wherein “[t]he issue tracker receives information relating to a plurality of issues from a plurality of users, displays the information relating to the issues, and allows the browsing of the information relating to each of the issues.” (See Underwood, abstract).

Applicants respectfully submit Underwood does not cure the deficiencies of Neely, Vasavada, Pazandek, and/or Drolet in arriving at Applicants’ claimed invention, as it does not alone or in combination with Neely, Vasavada, Pazandek, or Drolet disclose or suggest each and every element as recited in Applicants’ amended claim 22. Specifically, Underwood does not disclose or suggest “a generic file parser.” Underwood does not disclose or suggest “a generic file parser configured to receive...data in a plurality of formats.” Underwood does not disclose or suggest a “generic file parser configured to output data in a common format.” Underwood

does not disclose or suggest “at least one specific parsing module corresponding to at least one of said plurality of formats.” Underwood does not disclose or suggest a “specific parsing module(s) being configured to overwrite functions of the generic file parser.” Underwood does not disclose or suggest a “specific parsing module including at least one extension of said generic file parser.”

Thus, Applicants respectfully submit Neely, Vasavada, Pazandek, Drolet, or Underwood alone or in combination do not render independent claim 22, and by extension all other claims which are dependent thereupon, obvious to one skilled in the art. Therefore, Applicants respectfully submit that this five reference rejection is improper and should be withdrawn. Reconsideration is respectfully requested.

Claims 33-40 are rejected under 35 U.S.C. §103(a) as being unpatentable over Neely and Vasavada, in view of Pazandek, in view of Drolet. Applicants respectfully traverse this four reference rejection.

The Examiner acknowledges that Neely does not disclose or suggest all the limitations of claim 33, including the limitations of the expense information being received from a plurality of expense data providers or a specific parsing module and an extension to the specific parsing module. (Office Action, page 11). The Examiner acknowledges that the combination of Neely and Vasavada does not disclose or suggest all the limitations of claim 33, including the limitations of providing at least one specific parsing module corresponding to at least one of said plurality of formats, the specific parsing module(s) being adapted to overwrite functions of the generic file parser which are not suited for a format of said plurality of formats corresponding to the respective specific parsing module, the at least one extension being adapted to process specific fields of said expense information. (Office Action, page 11). Further, the Examiner acknowledges that the combination of Neely, Vasavada, and Pazandek does not disclose or suggest all the limitations of claim 33, including the limitations of sorting said parsed data into a plurality of temporary tables, said sorting being a function of said plurality of fields, to form sorted data; and to re-sorting and inserting said sorted data into a plurality of tables in a database. (Office Action, page 12). However, the Examiner asserted that Drolet cures the deficiencies of Neely, Vasavada, and/or Pazandek by disclosing “sorting said parsed data into a plurality of temporary tables, said sorting being a function of said plurality of fields, to form sorted data; and

to re-sorting and inserting said sorted data into a plurality of tables in a database.” (Office Action, page 12).

Without acquiescing to or acknowledging the Examiner’s assertions as correct, Applicants have amended claim 33 herewith to more clearly define the invention. Applicants respectfully submit Neely, Vasavada, Pazandek, or Drolet alone or in combination does not disclose or suggest Applicants’ claimed invention as claimed in amended claim 33.

Amended claim 33 recites:

33. A method for processing expense information comprising: providing **a generic file parser configured to receive said expense information from a plurality of expense data providers**, wherein said expense information includes **data in a plurality of formats**, said expense information including invoice information and transaction information, **said generic file parser configured to output data in a common format**; providing **at least one specific parsing module** corresponding to at least one of said plurality of formats, the **specific parsing module(s) being configured to overwrite functions of the generic file parser** which are not suited for a format of said plurality of formats corresponding to the respective specific parsing modules; said **at least one specific parsing module including at least one extension of said generic file parser**, the extension(s) being configured to process specific fields of said expense information; receiving said expense information from said plurality of expense data providers; said generic file parser parsing said expense information as a function of a plurality of fields to form parsed data; sorting said parsed data into a plurality of temporary tables, said sorting being a function of said plurality of fields, to form sorted data; providing an invoice processing module configured to process said expense information to use said invoice information to for invoicing; providing a balance processing module configured to process said expense information to use said transaction information for specific accounts; and re-sorting and inserting said sorted data into tables in a database. *(emphasis added)*.

Contrary to the Examiner’s assertion, for the reasons discussed above with respect to amended claim 22, which is representative of the limitations in amended claim 33, Neely, Vasavada, Pazandek, or Drolet alone or in combination does not disclose or suggest Applicants’ claimed invention as recited in amended claim 33, and by extension claims 34-40 which are dependent thereupon. Specifically, Neely, Vasavada, Pazandek, or Drolet, which the Examiner is

improperly combining in hindsight with the benefit of Applicants' disclosure, alone or in combination do not disclose or suggest "providing a generic file parser configured to receive said expense information from a plurality of expense data providers, wherein said expense information includes data in a plurality of formats, ... configured to output data in a common format." These four references do not disclose or suggest "providing at least one specific parsing module corresponding to at least one of said plurality of formats, the specific parsing module(s) being configured to overwrite functions of the generic file parser which are not suited for a format of said plurality of formats corresponding to the respective specific parsing modules." These four references do not disclose or suggest "at least one specific parsing module including at least one extension of said generic file parser, the extension(s) being configured to process specific fields of said expense information." The four references alone or in combination do not disclose or suggest "receiving said expense information from said plurality of expense data providers," as specifically recited in amended claim 33.

Further, Drolet does not disclose or suggest "sorting said parsed data into a plurality of temporary tables, ... and re-sorting and inserting said sorted data into tables in a database," as recited in amended claim 33. Rather, Drolet discloses "[t]he staging database 150 validates the received PIP data to ensure that the data for the business rules conform to the applicable formats and that the defined roles do not violate security standards;" then "the staging database 150 exports the data into the alert database 155, where both rule processing and alert processing can occur." (See Drolet, paragraph [0063]). In contrast to the Examiner's assertion, Applicants respectfully submit that parsed data in Drolet is not sorted into temporary tables within the staging database of Drolet. Instead the staging database of Drolet simply validates the data and exports the data to the alert database. Thus, Drolet does not disclose or suggest "sorting said parsed data into a plurality of temporary tables, ... and re-sorting and inserting said sorted data into tables in a database," as recited in amended claim 33.

Since each and every element of Applicants' claimed invention is not disclosed or suggested in any cited reference alone or in combination, it appears that in asserting this four reference obviousness rejection the Examiner gleaned knowledge from the Applicants' disclosure contrary to *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 421 (2007), which states "[a]

factfinder should be aware, of course, of the distortion caused by hindsight bias and must be cautious of arguments reliant upon *ex post* reasoning.” Even assuming *arguendo* that the four references cited by the Examiner could be combined and/or modified as the Examiner has suggested in rejecting the claims, Applicants respectfully request that the rejected claims be reconsidered in light of well-established legal principles, which provide,

“[a] patent [claim] composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does. This is so because inventions in most, if not all, instances rely upon building blocks long since uncovered, and claimed discoveries almost of necessity will be combinations of what, in some sense, is already known.” *Id.* at 418-19.

The particular teachings that the Examiner suggests, in hindsight with the benefit of Applicants’ disclosure, in an attempt to arrive at the Applicants’ claimed invention, are neither disclosed nor suggested by any of the cited references. Applicants respectfully submit Neely, Vasavada, Pazandek, or Drolet alone or in combination do not render independent claim 33, and by extension all other claims which are dependent thereupon, obvious to one skilled in the art. Therefore, Applicants respectfully submit that the rejections are improper and should be withdrawn. Reconsideration is respectfully requested.

**CONCLUSION**

For at least the reasons set forth above, reconsideration and allowance of this Application are believed to be in order, and such action is hereby solicited. If any points remain an issue which the Examiner feels may be best resolved through a telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below. The Examiner is invited and encouraged to telephone the undersigned with any concerns in furtherance of the prosecution of the present Application.

Please charge any deficiency as well as any other fee(s) which may become due at any time during the pendency of this Application, or credit any overpayment of such fee(s) to Deposit Account No. 50-2896.

Respectfully submitted,

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